

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 06/30/2020

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration Number

Bullpen Strategy Group, Inc.

6504

- (c) Primary Business Address

1500 Wilson Blvd.
5th Floor
Arlington, VA 22209

2. Has there been a change in the information previously furnished in connection with the following?

- (a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

- (b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☒ No ☐

- (c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

Bullpen Strategy Group, Inc. acquired Emerson Strategy Limited, a London-based research firm, on May 1, 2020. Ownership and control of Bullpen Strategy Group, Inc. remains unchanged.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.

3. If the registrant previously filed an Exhibit C
- ¹
- , state whether any changes therein have occurred during this 6 month reporting period. Yes
- ☐
- No
- ☒

If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Ceased
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5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
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(b) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

Date of Termination

Foundation for Civic Education

02/27/2020

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date Added

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☐ No ☐ N/A ☒Exhibit B⁴ Yes ☐ No ☐ N/A ☒

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes ☒ No ☐

If yes, has the registrant filed an amendment to these exhibits? Yes ☒ No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
See Attachment A.	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

See Attachment A.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Attachment B.				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, please explain why no monies were received.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates (all payments)	01/24/20	Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates (all payments)	Payment for services rendered under agreement with foreign principal.	\$27,500	\$27,500
	02/26/20			\$27,500	\$27,500
	04/21/20			\$27,500	\$27,500

\$82,500

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, has the registrant previously filed an Exhibit D⁸ to its registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date _____

If no, please file the required Exhibit D.

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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6, 7 A registrant is required to file an Exhibit D if he/she collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain why no disbursements were made.

No disbursements or expenditures were required to provide the services under the registrant's agreements with foreign principals, which were limited in scope.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
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N/A

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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^{10, 11} Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☐ No ☒

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

N/A

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
N/A		

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (specify) _____ | | | |

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- | | | |
|--|---|---|
| <input type="checkbox"/> Public officials | <input type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Other (specify) _____ | | |

20. Indicate the language used in the informational materials:

- ☐ English ☐ Other (specify) _____

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

If no, please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature¹³

7/29/20

JOSEPH POUNDER



¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Bullpen Strategy Group, Inc.
Supplemental Statement for Period Ending 06/30/20
Attachment A

Question 11

For Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates: Strategic communications support and guidance in furtherance of the interests of the Embassy of the United Arab Emirates with an emphasis on strengthening bilateral relations and regional security of the United Arab Emirates, in particular including issues relating to client's termination of relations with Qatar and accuracy and transparency of Qatar government-owned media. Activities and support engaged in by the registrant in furtherance of these efforts included one-on-one interactions with members of the news media in the United States, public records requests, research and news monitoring, strategic communications support and guidance, and assistance with content development to support and promote the aforementioned interests of the Embassy of the United Arab Emirates.

For Foundation for Civic Education: Media and influencer outreach to support the goals of the foreign principal, including promotion of democracy and free speech in the Republic of Georgia, promotion of bilateral relations between the U.S. and the Republic of Georgia, encouraging a regional free trade agreement with the U.S., and raising awareness of Russian influence in the Caucasus/Black Sea region.

Question 12

For Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of the United Arab Emirates: Activities in furtherance of the interests of the Embassy of the United Arab Emirates with an emphasis on strengthening bilateral relations and regional security of the United Arab Emirates, in particular including issues relating to client's termination of relations with Qatar and accuracy and transparency of Qatar government-owned media. The means employed to achieve this purpose included one-on-one interactions with members of the news media in the United States (see Attachment B for contacts list), public records requests, strategic communications support and guidance, and assistance with content development. The registrant did not arrange, sponsor, or deliver speeches, lectures, or radio or TV broadcasts on behalf of the Embassy of the United Arab Emirates. No informational materials were distributed by the registrant during the reporting period.

For Foundation for Civic Education: Media and influencer outreach to support the goals of the foreign principal, including promotion of democracy and free speech in the Republic of Georgia, promotion of bilateral relations between the U.S. and the Republic of Georgia, encouraging a regional free trade agreement with the U.S., and raising awareness of Russian influence in the Caucasus/Black Sea region. See Attachment B for contacts list. The registrant did not arrange, sponsor, or deliver speeches, lectures, or radio or TV broadcasts on behalf of the foreign principal. No informational materials were distributed by the registrant during the reporting period.

**Bullpen Strategy Group,
Supplemental Statement
for Period Ending 06/30/20
Attachment B**

Foreign Principal	Date	Contact	Method	Purpose
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	1/8/2020 (ongoing)	The New York Post	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	1/8/2020 (ongoing)	The Washington Examiner	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	1/21/2020 (ongoing)	Vanity Fair	Electronic / Phone / Meeting	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	1/22/2020 (ongoing)	The Daily Beast	Electronic / Phone / Meeting	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	1/25/2020 (ongoing)	Wall Street Journal	Phone / Meeting	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	1/28/2020 (ongoing)	RealClearPolitics	Electronic	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	1/28/2020 (ongoing)	CNN	Electronic	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	1/29/2020 (ongoing)	Vanity Fair	Electronic / Meeting	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/10/2020 (ongoing)	NPR	Electronic / Phone / Meeting	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/21/2020 (ongoing)	The Washington Free Beacon	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/25/2020 (ongoing)	The Miami Herald	Electronic / Meeting	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	The Daily Caller	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	The Bulwark	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	NBC	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	Mediaite	Electronic	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	Business Insider	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	Washington Examiner	Electronic	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	Inside Defense	Electronic	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	Vice	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	BuzzFeed News	Electronic / Meeting	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	Axios	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/26/2020 (ongoing)	Yahoo News	Electronic	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	2/28/2020 (ongoing)	The Huffington Post	Electronic / Phone / Meeting	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	3/12/2020 (ongoing)	CNN	Phone / Meeting	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	3/16/2020 (ongoing)	POLITICO	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	3/18/2020 (ongoing)	BuzzFeed	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	3/20/2020 (ongoing)	Axios	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	5/13/2020 (ongoing)	The Daily Caller	Electronic	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	5/13/2020 (ongoing)	The Spectator USA	Electronic / Phone	See Response to Questions 11/12

Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	5/13/2020 (ongoing)	Fox News	Electronic / Phone	See Response to Questions 11/12
Akin Gump Strauss Hauer & Feld LLP on behalf of the Embassy of	6/24/2020 (ongoing)	Mother Jones	Electronic / Phone / Meeting	See Response to Questions 11/12
Foundation for Civic Education	1/8/2020	The Washington Examiner	Electronic	See Response to Questions 11/12
Foundation for Civic Education	1/8/2020	The American Prospect	Electronic	See Response to Questions 11/12
Foundation for Civic Education	1/8/2020 (ongoing)	Media Voices	Electronic	See Response to Questions 11/12
Foundation for Civic Education	1/15/2020	NPR	Electronic	See Response to Questions 11/12
Foundation for Civic Education	1/25/2020	Wall Street Journal	Phone / Meeting	See Response to Questions 11/12
Foundation for Civic Education	2/26/2020	BuzzFeed News	Electronic / Meeting	See Response to Questions 11/12